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**BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA**

Order Instituting Rulemaking on the Commission's
Own motion into the service quality standards for
All telecommunications carriers and revisions to
General Order 133-B

R.02-12-004

OPENING COMMENTS OF

**CALAVERAS TELEPHONE COMPANY (U 1004 C)
CAL-ORE TELEPHONE CO. (U 1006 C)
DUCOR TELEPHONE COMPANY (U 1007 C)
GLOBAL VALLEY NETWORKS, INC. (U 1008 C)
FORESTHILL TELEPHONE CO. (U 1009 C)
HAPPY VALLEY TELEPHONE COMPANY (U 1010 C)
HORNITOS TELEPHONE COMPANY (U 1011 C)
KERMAN TELEPHONE COMPANY (U 1012 C)
PINNACLES TELEPHONE CO. (U 1013 C)
THE PONDEROSA TELEPHONE CO. (U 1014 C)
SIERRA TELEPHONE COMPANY, INC. (U 1016 C)
THE SISKIYOU TELEPHONE COMPANY (U 1017 C)
THE VOLCANO TELEPHONE COMPANY (U 1019 C)
WINTERHAVEN TELEPHONE COMPANY (U 1021 C)**

**REGARDING ASSIGNED COMMISSIONER'S RULING
AND SCOPING MEMO DATED MARCH 30, 2007**

Calaveras Telephone Company, Cal-Ore Telephone Co., Ducor Telephone Company, Global Valley Networks, Inc., Foresthill Telephone Co., Happy Valley Telephone Company, Hornitos Telephone Company, Kerman Telephone Co., Pinnacles Telephone Co., The Ponderosa Telephone Co., Sierra Telephone Company, Inc., The Siskiyou Telephone Company, The Volcano Telephone Company and Winterhaven Telephone Company (collectively, the "Small LECs") hereby file these opening comments on the Assigned Commissioner's Ruling and Scoping Memo ("Ruling") issued in this Rulemaking 02-12-004 ("Rulemaking") on March 30, 2007. In summary, the Commission does

1 not need to concern itself with service quality for the Small LECs at this time. Their service quality
2 remains excellent across the board, and there will be no benefit to customers, the Small LECs, or the
3 Commission resulting from the creation of new standards or reporting for the Small LECs

4
5 **I.**

6 **NOTHING HAS CHANGED FOR THE SMALL LECs REGARDING SERVICE QUALITY
7 SINCE THEY LAST FILED COMMENTS IN THIS PROCEEDING IN MARCH, 2003**

8 When the Small LECs filed their opening and reply comments in this proceeding in March
9 and May of 2003, they submitted a substantial amount of data concerning their service quality. The
10 data they submitted demonstrated across the board that the Small LECs were providing excellent
11 service to their customers according to every measurement employed by the Commission. Nothing
12 has changed in the succeeding four years in this regard. Customer complaints with respect to Small
13 LEC service are virtually nonexistent. In addition, several of the Small LECs have gone through rate
14 cases where the Commission has examined service quality on an individualized basis, and the
15 Commission has not noted service problems in any of those individual cases. The Small LECs
16 continue to be rate-base regulated, and most of them are, as a practical matter, required to file rate
17 cases on a periodic basis. As those rate cases are processed, the Commission will have further
18 opportunities to examine the Small LECs' service quality.

19 **II.**

20 **IN LIGHT OF THE EXISTING HIGH QUALITY OF SMALL LEC
21 SERVICE, THE BENEFITS OF NEW MEASUREMENTS
22 OR RULES ARE LIKELY TO BE INSIGNIFICANT**

23 In light of the high level of service quality provided by the Small LECs, there is no reason to
24 adopt new service standards for the Small LECs.. The issues designated for comment at pages 6 – 7
25 of the Ruling, however, are more focused on additional reporting than on new standards of
26 measurement. Despite the sharpened focus, the same conclusion is compelled by logic and existing
27 evidence with respect to reporting. Additional reporting by the Small LECs would be expensive, and
28 these costs would inevitably be paid for by telephone customers. In order to justify new reporting for
the Small LECs, the Commission must be able to identify clear benefits to the customers who will

1 pay the charges. The Small LECs submit that such benefits would be minimal or nonexistent.

2
3 **III.**
4 **COMMENTS ON THE COMMISSION'S FOUR QUESTIONS**

5 The Small LECs respond as follows to the questions posed by the Ruling at pages 6 – 7:

6
7 1. Customer satisfaction surveys. For the Small LECs, this is a solution in search of a
8 problem, and an expensive one at that. As is explained above, Small LEC service quality is excellent,
9 and it is examined periodically for most Small LECs through the rate case process. Their service is
10 also subject to existing reporting requirements under General Order 133-B. Most Small LECs have
11 very small customer bases. The Small LECs typically have conveniently-located and highly-visible
12 local offices. Customers have many convenient opportunities to bring the rare quality issues that may
13 arise to the attention of the Small LECs. Customer satisfaction surveys would be an unnecessary
14 additional expense that is unlikely to yield any benefit at all.

15 2. ARMIS reporting. The Small LECs do not file ARMIS reports with the FCC.
16 Additional comprehensive reporting on that level of detail would be extremely burdensome and
17 expensive for the Small LECs and would yield no corresponding benefit to customers.

18
19 3. Major service interruptions. These are extremely rare for the Small LECs. They
20 presently report them to the Commission and have no objection to continuing to do so. However, the
21 Small LECs believe that the Commission should conform its current service outage reporting
22 requirements to the FCC's requirements. *See* 47 C.F.R. § 63.100.

23 4. Continuation of existing reports. The Small LECs are presently subject to reporting
24 under General Order 133-B and do not object to its continuation. They have systems in place that
25 capture the necessary information, and the expense of continuing these procedures and reporting
26 when required will not be great.
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**IV.
CONCLUSION**

The Small LECs suggest that before implementing new service quality measurements or reporting rules that would apply to them, the Commission consider some fundamental questions:

1. What specific problems exist?
2. Are additional measurements or rules necessary to address these problems, or will enforcement of existing rules suffice?
3. Can measurements and rules be developed to remedy problems that are documented in an efficient and cost-effective manner?
4. Do the proposed measurements or rules provide greater benefits to customers than the costs of implementing, monitoring, and enforcing them?

The Small LECs submit that based on evidence already in the record in this proceeding and additional evidence developed by the Commission in a series of Small LEC rate cases, these questions cannot be answered in a way that would justify imposing additional reporting on the Small LECs.

Executed at San Francisco, California this 14th day of May, 2007.

Respectfully submitted,

E. Garth Black
Mark P. Schreiber
Sean P. Beatty
Patrick M. Rosvall
COOPER, WHITE & COOPER LLP
201 California Street, 17th Floor
San Francisco, CA 94111
(415) 433-1900
FAX: (415) 433-5530

By: 

E. Garth Black
email: gblack@cwclaw.com
Attorneys for Small LECs

1 CERTIFICATE OF SERVICE BY MAIL

2
3 I, Martin Spence, declare:

4 I am a resident of the State of California, over the age of eighteen years, and not a party to the
5 within action. My business address is COOPER, WHITE & COOPER LLP, 201 California Street,
6 17th Floor, San Francisco, CA 94111.

7 On May 14, 2007, I served the following:

8 **OPENING COMMENTS OF**

9 **CALAVERAS TELEPHONE COMPANY (U 1004 C)**
10 **CAL-ORE TELEPHONE CO. (U 1006 C)**
11 **DUCOR TELEPHONE COMPANY (U 1007 C)**
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22 **WINTERHAVEN TELEPHONE COMPANY (U 1021 C)**

23 **REGARDING ASSIGNED COMMISSIONER'S RULING**
24 **AND SCOPING MEMO DATED MARCH 30, 2007**

25 by email to those who provided email addresses, and by placing a true and correct copy thereof with
26 the firm's mailing room personnel for mailing in accordance with the firm's ordinary practices to the
27 parties on the CPUC's service list in this proceeding.

28 I declare under penalty of perjury that the foregoing is true and correct.

Executed on May 14, 2007 at San Francisco, California.

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SERVICE LIST

CPUC Service List as of May 10, 2007 Proceeding No. R. 02-12-004

ADAM L. SHERR
ATTORNEY AT LAW
QWEST COMMUNICATIONS CORPORATION
1600 7TH AVENUE, 3206
SEATTLE, WA 98191-0000

ALAN L. PEPPER
MITCHELL SILBERBERG & KNUPP LLP
TRIDENT CENTER
11377 W OLYMPIC BLVD., SUITE 200
LOS ANGELES, CA 90064-1683

MARILYN ASH
U.S. TELEPACIFIC CORP.
6101 CHRISTIE AVE.
EMERYVILLE, CA 94608

WILLIAM D. WALLACE ESQ.
VERIZON WIRELESS
1300 I STREET, N.W., SUITE 400 WEST
WASHINGTON, DC 20005

CORALETTE HANNON, ESQUIRE
AARP LEGISLATIVE REPRESENTATIVE
6705 REEDY CREEK ROAD
CHARLOTTE, NC 28215

CHRISTINA V. TUSAN, ATTORNEY AT LAW
CALIFORNIA DEPARTMENT OF JUSTICE
300 SOUTH SPRING ST., 11TH FLOOR
LOS ANGELES, CA 90012

CHRISTINE MAILLOUX, ATTORNEY AT LAW
THE UTILITY REFORM NETWORK
711 VAN NESS AVENUE, SUITE 350
SAN FRANCISCO, CA 94102

ANDREW O. ISAR
DIRECTOR-STATE AFFAIRS
ASSOCIATION OF
COMMUNICATIONS ENTERPRISE
7901 SKANSIE AVE., SUITE 240
GIG HARBOR, WA 98335

ANITA C. TAFF-RICE
ATTORNEY AT LAW
1547 PALOS VERDES MALL, SUITE 298
WALNUT CREEK, CA 94597

BARBARA R. ALEXANDER
CONSUMER AFFAIRS CONSULTANT
83 WEDGEWOOD DRIVE
WINTHROP, ME 4364

WILLIAM NUSBAUM, ATTORNEY AT LAW
THE UTILITY REFORM NETWORK
711 VAN NESS AVENUE, SUITE 350
SAN FRANCISCO, CA 94102

CHARLES HARAK
NATIONAL CONSUMER LAW CENTER
77 SUMMER STREET, 10TH FLOOR
BOSTON, MA 2110

CINDY MANHEIM
CINGULAR WIRELESS
PO BOX 97061
REDMOND, WA 98073-9761

DAVID P. DISCHER, GENERAL ATTORNEY
AT&T CALIFORNIA
525 MARKET STREET, ROOM 2027
SAN FRANCISCO, CA 94105

ALOA STEVENS, DIRECTOR
GOVERNMENT & EXTERNAL AFFAIRS
FRONTIER COMMUNICATIONS
PO BOX 708970
SANDY, UT 84070-8970

ANN JOHNSON
VERIZON
HQE02F61
600 HIDDEN RIDGE
IRVING, TX 75038

BOB FINKELSTEIN, ATTORNEY AT LAW
THE UTILITY REFORM NETWORK
711 VAN NESS AVENUE, SUITE 350
SAN FRANCISCO, CA 94102

CHARLES E. BORN, MANAGER-STATE
GOVERNMENT AFFAIRS
FRONTIER, A CITIZENS
TELECOMMUNICATIONS COMPANY
PO BOX 340
ELK GROVE, CA 95759

CHARLYN A. HOOK
CALIF PUBLIC UTILITIES COMMISSION
LEGAL DIVISION
ROOM 4107
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3214

CARL K. OSHIRO, ATTORNEY AT LAW
CSBRT/CSBA
100 PINE STREET, SUITE 3110
SAN FRANCISCO, CA 94111

DAVID A. SIMPSON, ATTORNEY AT LAW
SIMPSON PARTNERS LLP
900 FRONT STREET, SUITE 300
SAN FRANCISCO, CA 94111

DOUGLAS H. BOSCO
HOLLAND & KNIGHT, LLC
50 CALIFORNIA STREET, SUITE 2800
SAN FRANCISCO, CA 94111

SARAH DEYOUNG
EXECUTIVE DIRECTOR
CALTEL
50 CALIFORNIA STREET, SUITE 1500
SAN FRANCISCO, CA 94111

DALE PIIRU
CALIF PUBLIC UTILITIES COMMISSION
TELECOMMUNICATIONS
& CONSUMER ISSUES BRANCH
ROOM 4108
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3214

DOUG GARRETT
COX CALIFORNIA TELCOM LLC
2200 POWELL STREET, SUITE 1035
EMERYVILLE, CA 94608

DANA APPLING
CALIF PUBLIC UTILITIES COMMISSION
DIVISION OF RATEPAYERS ADVOCATES
ROOM 4201
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3214

ELAINE M. DUNCAN, ATTORNEY AT LAW
VERIZON CALIFORNIA INC.
711 VAN NESS AVENUE, SUITE 300
SAN FRANCISCO, CA 94102

EARL NICHOLAS SELBY
ATTORNEY AT LAW
LAW OFFICES OF EARL NICHOLAS SELBY
418 FLORENCE STREET
PALO ALTO, CA 94301

ETHAN SPRAGUE
PAC-WEST TELECOMM, INC.
1776 W. MARCH LANE, SUITE 250
STOCKTON, CA 95207

ESTHER NORTHRUP
COX CALIFORNIA TELCOM
5159 FEDERAL BLVD.
SAN DIEGO, CA 92105

FALINE FUA
CALIF PUBLIC UTILITIES COMMISSION
PROGRAM MANAGEMENT &
IMPLEMENTATION BRANCH
AREA 3-E
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3214

GAYATRI SCHILBERG
JBS ENERGY
311 D STREET, SUITE A
WEST SACRAMENTO, CA 95605

GLENN STOVER
ATTORNEY AT LAW
STOVER LAW
221 MAIN STREET, SUITE 800
SAN FRANCISCO, CA 94105-1906

GREGORY L. CASTLE, SENIOR COUNSEL
AT&T CALIFORNIA
525 MARKET STREET, RM. 2022
SAN FRANCISCO, CA 94105

GLENN SEMOW
CALIFORNIA CABLE & TELECOMM. ASSOC.
360 22ND STREET, STE. 750
OAKLAND, CA 94612

RUDY SASTRA
CALIF PUBLIC UTILITIES COMMISSION
UTILITY & PAYPHONE ENFORCEMENT
AREA 2-D
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3214

MARGARET L. TOBIAS
TOBIAS LAW OFFICE
460 PENNSYLVANIA AVENUE
SAN FRANCISCO, CA 94107

JACQUE LOPEZ, LEGAL ASSISTANT
VERIZON CALIFORNIA INC
CA501LB
112 LAKEVIEW CANYON ROAD
THOUSAND OAKS, CA 91362

JAN HEWITT
AT&T CALIFORNIA
REGULATORY DEPT.
525 MARKET ST., ROOM 1803
SAN FRANCISCO, CA 94105

JOHN CLARK, ATTORNEY AT LAW
GOODIN MACBRIDE SQUERI
DAY & LAMPREY LLP
505 SANSOME STREET, 9TH FLOOR
SAN FRANCISCO, CA 94111

JAMES M. TOBIN, ESQUIRE
TWO EMBARCADERO CENTER
SUITE 1800
SAN FRANCISCO, CA 94111

JASON J. ZELLER
CALIF PUBLIC UTILITIES COMMISSION
LEGAL DIVISION
ROOM 5030
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3214

JANICE L. GRAU
CALIF PUBLIC UTILITIES COMMISSION
DIVISION OF ADMINISTRATIVE
LAW JUDGES
ROOM 5011
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3214

JOHN GUTIERREZ, DIRECTOR,
GOVERNMENT AFFAIRS
COMCAST PHONE OF CALIFORNIA, LLC
12647 ALCOSTA BLVD., SUITE 200
SAN RAMON, CA 94583

JEFFREY M. PFAFF
SPRINT PCS
KSOPHN0212-2A509
6450 SPRINT PARKWAY
OVERLAND PARK, KS 66251-6100

JOSH THIERIOT
PAC-WEST TELECOMM, INC.
1776 W. MARCH LN, STE. 250
STOCKTON, CA 95207

JOSEPH F. WIEDMAN, ATTORNEY AT LAW
GOODIN MACBRIDE SQUERI DAY
& LAMPREY LLP
505 SANSOME STREET, SUITE 900
SAN FRANCISCO, CA 94111

KATIE NELSON
DAVIS WRIGHT TREMAINE, LLP
505 MONTGOMERY STREET, SUITE 800
SAN FRANCISCO, CA 94111-6533

KRISTIN JACOBSON
MARKET ATTORNEY, CONSULTANT
NEXTEL OF CALIFORNIA, INC.
1255 TREAT BLVD., SUITE 800
WALNUT CREEK, CA 94596

LAURA L. HOLLOWAY
NEXTEL COMMUNICATIONS, INC.
2001 EDMUND HALLEY DRIVE
RESTON, VA 20091

JOHN M. LEUTZA
CALIF PUBLIC UTILITIES COMMISSION
COMMUNICATIONS DIVISION
ROOM 3210
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3214

JOSE JIMENEZ
COX CALIFORNIA TELCOM, L.L.C.
2200 POWELL STREET, SUITE 1035
EMERYVILLE, CA 94608

JOEY PERMAN
CALIF PUBLIC UTILITIES COMMISSION
MARKET STRUCTURE BRANCH
320 WEST 4TH STREET SUITE 500
LOS ANGELES, CA 90013

JUDY PAU
DAVIS WRIGHT TREMAINE LLP
505 MONTGOMERY STREET, SUITE 800
SAN FRANCISCO, CA 94111-6533

JAMES W. MCTARNAGHAN
ATTORNEY AT LAW
DUANE MORRIS LLP
ONE MARKET, SPEAR TOWER 2000
SAN FRANCISCO, CA 94105-1104

KEVIN SAVILLE
ASSOCIATE GENERAL COUNSEL
FRONTIER COMMUNICATIONS
2378 WILSHIRE BLVD.
MOUND, MN 55364

KATHERINE S. RITCHEY
ATTORNEY AT LAW
JONES DAY
555 CALIFORNIA STREET, 26TH FLOOR
SAN FRANCISCO, CA 94104

W. LEE BIDDLE
FERRIS AND BRITTON, APC
401 W. A ST., SUITE 1600
SAN DIEGO, CA 92101

JOHN SISEMORE, DIRECTOR
AT&T SERVICES
175 E. HOUSTON STREET, ROOM 10-M-10
SAN ANTONIO, TX 78205

JEAN PARKER
WORKING ASSETS
101 MARKET STREET, SUITE 700
SAN FRANCISCO, CA 94105

JOSH P. THIERIOT, REGULATORY TEAM
PAC-WEST TELECOMM
1776 W. MARCH LANE, SUITE 250
STOCKTON, CA 95207

JAMES W. HOWARD
CALIF PUBLIC UTILITIES COMMISSION
UTILITY & PAYPHONE ENFORCEMENT
770 L STREET, SUITE 1050
SACRAMENTO, CA 95814

KATHERINE K. MUDGE, SENIOR COUNSEL
COVAD COMMUNICATIONS COMPANY
7000 NORTH MOPAC EXPRESSWAY, 2D FL
AUSTIN, TX 78731

KAREN MILLER
CALIF PUBLIC UTILITIES COMMISSION
PUBLIC ADVISOR OFFICE
ROOM 2103
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3214

LAEL ATKINSON
COVAD COMMUNICATIONS COMPANY
816 CONGRESS AVENUE, SUITE 1100
AUSTIN, TX 78701

LUPE DE LA CRUZ
AARP CALIFORNIA
1415 L ST STE 960
SACRAMENTO, CA 95814-3977

LAURIE ITKIN
CRICKET COMMUNICATIONS, INC.
10307 PACIFIC CENTER COURT
SAN DIEGO, CA 92121

LEON M. BLOOMFIELD, ATTORNEY AT LAW
WILSON & BLOOMFIELD, LLP
1901 HARRISON STREET, SUITE 1620
OAKLAND, CA 94612

MARJORIE O. HERLTH
QWEST COMMUNICATIONS CORPORATION
1801 CALIFORNIA ST., SUITE 4700
DENVER, CO 80202

MARC D. JOSEPH, ATTORNEY AT LAW
ADAMS BROADWELL JOSEPH & CARDOZO
601 GATEWAY BLVD. STE 1000
SOUTH SAN FRANCISCO, CA 94080

MICHAEL R. ROMANO, DIRECTOR-STATE
REGULATORY AFFAIRS
LEVEL 3 COMMUNICATIONS, LLC
2300 CORPORATE PARK DR STE. 600
HERNDON, VA, 20171-4845

MARIA POLITZER
CALIFORNIA CABLE & TELECOM
ASSOCIATION
360 22ND STREET, NO. 750
OAKLAND, CA 94612

TERESA M. ONO
AT&T COMMUNICATIONS
OF CALIFORNIA, INC.
525 MARKET ST. 18TH FLOOR, 4
SAN FRANCISCO, CA 94105

LINDA J. WOODS
CALIF PUBLIC UTILITIES COMMISSION
UTILITY & PAYPHONE ENFORCEMENT
AREA 2-A
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3214

LINETTE YOUNG
CALIF PUBLIC UTILITIES COMMISSION
CONSUMER PROTECTION
AND SAFETY DIVISION
AREA 2-D
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3214

MARGARET FELTS, PRESIDENT
CALIFORNIA COMMUNICATIONS ASSN
1851 HERITAGE LANE STE 255
SACRAMENTO, CA 95815-4923

MAUREEN K. FLOOD
TELECOM POLICY ANALYST
HARRIS, WILTSHIRE & GRANNIS LLP
1200 EIGHTEENTH STREET, NW
WASHINGTON, DC 20036

MONICA L. MCCRARY
CALIF PUBLIC UTILITIES COMMISSION
LEGAL DIVISION
ROOM 5134
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3214

MICHAEL SHAMES, ATTORNEY AT LAW
UTILITY CONSUMERS' ACTION NETWORK
3100 FIFTH AVENUE, SUITE B
SAN DIEGO, CA 92103

PAMELA PRESSLEY
LITIGATION PROGRAM DIRECTOR
FOUNDATION FOR TAXPAYER
& CONSUMER RIGHTS
1750 OCEAN PARK BLVD., SUITE 200
SANTA MONICA, CA 90405

LESLA LEHTONEN, VP LEGAL AND
REGULATORY AFFAIRS
CALIFORNIA CABLE &
TELECOM ASSOCIATION
360 22ND STREET, SUITE 750
OAKLAND, CA 94612

DENISE MANN
CALIF PUBLIC UTILITIES COMMISSION
TELECOMMUNICATIONS & CONSUMER
ISSUES BRANCH
ROOM 4101
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3214

MICHAEL B. DAY, ATTORNEY AT LAW
GOODIN MACBRIDE SQUERI
DAY & LAMPREY LLP
505 SANSOME STREET, SUITE 900
SAN FRANCISCO, CA 94111

MICHAEL BAGLEY
VERIZON WIRELESS
15505 SAND CANYON AVENUE
IRVINE, CA 92612

MIKE MULKEY
ARRIVAL COMMUNICATIONS
1807 19TH STREET
BAKERSFIELD, CA 93301

MARY E. WAND, ATTORNEY AT LAW
MORRISON & FOERSTER LLP
425 MARKET STREET
SAN FRANCISCO, CA 94105

PETER A. CASCIATO
ATTORNEY AT LAW
PETER A. CASCIATO P.C.
355 BRYANT STREET, SUITE 410
SAN FRANCISCO, CA 94107

MELISSA W. KASNITZ
DISABILITY RIGHTS ADVOCATES
2001 CENTER STREET, THIRD FLOOR
BERKELEY, CA 94704-1204

REGINA COSTA
THE UTILITY REFORM NETWORK
711 VAN NESS AVENUE, SUITE 350
SAN FRANCISCO, CA 94102

RANDOLPH W. DEUTSCH
ATTORNEY AT LAW
SIDLEY, AUSTIN, BROWN & WOOD, LLP
SUITE 2000
555 CALIFORNIA STREET
SAN FRANCISCO, CA 94104

REX KNOWLES, REGIONAL VICE PRESIDENT
XO COMMUNICATIONS SERVICES, INC.
111 EAST BROADWAY, SUITE 1000
SALT LAKE CITY, UT 84111

RUMMELSBURG ROD
CNM NETWORK, INC.
4100 GUARDIAN STREET
SIMI VALLEY, CA 93063

RICHARD SMITH
CALIF PUBLIC UTILITIES COMMISSION
DIVISION OF ADMINISTRATIVE
LAW JUDGES
ROOM 5019
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3214

ROBERT SPANGLER
SNAVELY ING & MAJOROS
O'CONNOR & LEE INC
1220 L STREET N.W. SUITE 410
WASHINGTON, DC 20005

RUDY REYES
VERIZON
711 VAN NESS AVENUE, SUITE 300
SAN FRANCISCO, CA 94102

SARITA SARVATE
CALIF PUBLIC UTILITIES COMMISSION
ENERGY DIVISION
AREA 4-A
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3214

SHEILA HARRIS
MANAGER, GOVERNMENT AFFAIRS
INTEGRA TELECOM HOLDINGS, INC.
1201 NE LLOYD BLVD., STE.500
PORTLAND, OR 97232

SINDY J. YUN
CALIF PUBLIC UTILITIES COMMISSION
LEGAL DIVISION
ROOM 4300
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3214

SARAH E. LEEPER, ATTORNEY AT LAW
STEEFEL, LEVITT & WEISS
ONE EMBARCADERO CENTER, 30TH FLOOR
SAN FRANCISCO, CA 94111

SUSAN PEDERSEN, EXECUTIVE DIRECTOR
CELLULAR CARRIERS ASSOC. OF
CALIFORNIA
980 NINTH STREET, SUITE 2200
SACRAMENTO, CA 95814

STEPHEN H. KUKTA, COUNSEL
SPRINT NEXTEL
201 MISSION STREET, SUITE 1400
SAN FRANCISCO, CA 94105

STEPHEN B. BOWEN, ATTORNEY AT LAW
BOWEN LAW GROUP
235 MONTGOMERY STREET, SUITE 920
SAN FRANCISCO, CA 94104

SUSAN LIPPER, SENIOR MANAGER,
GOVERNMENT AFFAIRS
T-MOBILE USA, INC.
1755 CREEKSIDE OAKS DIVE, SUITE 190
SACRAMENTO, CA 95833

SUZANNE TOLLER, ATTORNEY AT LAW
DAVIS WRIGHT TREMAINE
505 MONTGOMERY STREET, SUITE 800
SAN FRANCISCO, CA 94111-6533

TERRANCE SPANN
US ARMY LEGAL SERVICES AGENCY
DEPARTMENT OF THE ARMY (JALS-RL)
901 N. STUART STREET, SUITE 700
ARLINGTON, VA 22203-1837

THOMAS MAHR
VICE PRESIDENT & GENERAL COUNSEL
VERIZON WIRELESS
15505 SAN CANYON AVE E305
IRVINE, CA 92618

THOMAS J. SELHORST
AT&T CALIFORNIA
525 MARKET STREET, RM. 2023
SAN FRANCISCO, CA 94105

TERRENCE E. SCOTT
SBC ADVANCED SOLUTIONS, INC.
2623 CAMINO RAMON, ROOM 2C111
SAN RAMON, CA 94583

WILLIAM K. MOSCA
COMCAST BUSINESS
COMMUNICATIONS, INC.
10 INDEPENDENCE WAY
WARREN, NJ 7059

MARK ASHBY
CINGULAR WIRELESS
5565 GLENRIDGE CONNECTOR, STE 1700
ATLANTA, GA 30342

M. ESTELA LARA
CENTRO LA FAMILIA
ADVOCACY SERVICES, INC
2014 TULARE STREET, SUITE 711
FRESNO, CA 93721

LUIS ARTEAGA
LATINO ISSUES FORUM
160 PINE STREET, SUITE 700
SAN FRANCISCO, CA 94111

CHRIS WITTEMAN
CALIF PUBLIC UTILITIES COMMISSION
LEGAL DIVISION
ROOM 5129
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3214

MICHAEL MANCHESTER
1749 10TH STREET, NO. 1
SANTA MONICA, CA 90404

AGNES NG
AT&T COMMUNICATIONS
OF CALIFORNIA, INC.
525 MARKET ST 20TH FLOOR 4
SAN FRANCISCO, CA 94105

ROBERT N. KITTEL
U.S. ARMY LITIGATION CENTER
901 N. STUART STREET, SUITE 700
ARLINGTON, VA 22203-1837

YVETTE HOGUE, EXECUTIVE DIRECTOR
AT&T CALIFORNIA
525 MARKET STREET, ROOM 1918
SAN FRANCISCO, CA 94105-2727

ALEJANDRO JIMENEZ
AT&T MOBILITY
12900 PARK PLAZA DRIVE
TUSTIN, CA 90703

ANDREA JOHNSON
AT&T CALIFORNIA
525 MARKET STREET, SUITE 1944
SAN FRANCISCO, CA 94105